

EXHIBIT C

FREEDOM FROM RELIGION *foundation*

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February 7, 2018

SENT VIA U.S. & ELECTRONIC MAIL: frhodes@putnamcityschools.org

Dr. Fred Rhodes
Superintendent
Putnam City Schools
5401 N.W. 40th
Oklahoma City, OK 73122

Re: Team Chaplain at Putnam City High School

Dear Superintendent Rhodes:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring at Putnam City High School. FFRF is a national nonprofit organization with 30,000 members across the country, including members in Oklahoma. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

A concerned area resident has reported that Putnam City High School has designated Rev. Mike Keahbone as team chaplain of its football team. It is our understanding that as part of this chaplaincy program he has been leading the team in prayers. Please see the enclosed photos. Rev. Keahbone has explained that his goal, in coordination with his church, is to proselytize players. He has stated, "if the Lord opens the door, we'll share the Gospel with them."¹

Public school football teams cannot appoint or employ a chaplain, seek out a spiritual leader for the team, or agree to have a volunteer team chaplain, because public schools may not advance or promote religion. Similarly, it is illegal for a public school or school-appointed volunteer to organize, sponsor, or lead prayers at public high school athletic events. *See generally, Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290 (2000) (holding student-led prayer over the loudspeaker before football games unconstitutional); *Lee v. Weisman*, 505 U.S. 577 (1992); *Wallace v. Jaffree*, 472 U.S. 38 (1985); *Epperson v. Arkansas*, 393 U.S. 97 (1967); *Sch. Dist. of Abington Twp. v. Schempp*, 374 U.S. 203 (1963); *Engel v. Vitale*, 370 U.S. 421 (1962). Thus, it is inappropriate for the Putnam City High School football team to hold prayer meetings before football games, or to designate a chaplain to do so.

Putnam City Schools cannot allow a non-school adult access to the children in its charge, and it certainly cannot grant that access to a religious speaker seeking to proselytize students. "The preservation and transmission of religious beliefs and worship is a

¹ <http://bpnews.net/47595/church-cheers-for-high-school-football-team>

responsibility and a choice committed to the private sphere.” *Santa Fe*, 530 U.S. at 310 (quoting *Lee v. Weisman*, 505 U.S. at 589).

School endorsement of Christianity is particularly troubling for the 47% of young Americans who are non-Christian,² including those who practice a minority religion and the 21% of those born after 1999, i.e. all of your current students, who identify as either atheist or agnostic.³ The “[s]chool sponsorship of a religious message is impermissible because it sends the ancillary message to members of the audience who are nonadherents ‘that they are outsiders, not full members of the political community, and an accompanying message to adherents that they are insiders, favored members of the political community.’” *Id.* (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688) (1984) (O’Connor, J., concurring)).

We ask that the District commence an immediate investigation into this complaint and take action to stop coaches and other school representatives from organizing, leading, or participating in prayers with student athletes, at practices or games. We also ask that the District take appropriate actions to end its chaplaincy program. Please inform us in writing of the steps you are taking to remedy this serious and flagrant violation of the First Amendment.

Sincerely,



Christopher Line
Patrick O’Reiley Legal Fellow
Freedom From Religion Foundation

² Robert P. Jones & Daniel Cox, *America’s Changing Religious Identity*, PUBLIC RELIGION RESEARCH INSTITUTE (Sept. 6, 2017), available at www.ppri.org/wp-content/uploads/2017/09/PRRI-Religion-Report.pdf.

³ *Atheism Doubles Among Generation Z*, THE BARN A GROUP (Jan. 24, 2018), www.barna.com/research/atheism-doubles-among-generation-z/.

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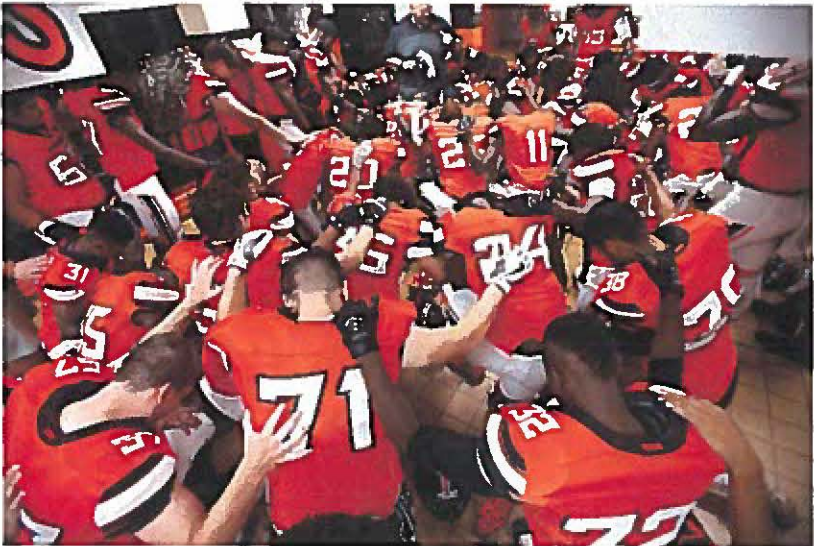
The Rev. Mike Keeshone, senior pastor of Cherokee Hills Baptist Church, prays with Putnam City High School football players before a game on Sept. 7 at Putnam City Stadium in Oklahoma City. (Photo by Sarah Phipps, The Oklahoman)

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The Rev. Mike Keeshone, senior pastor of Cherokee Hills Baptist Church, prays with Putnam City High School football players before a game on Sept. 14 at Putnam City Stadium in Oklahoma City. (Photo by Sarah Phipps, The Oklahoman)

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